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Entertainment Group
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18 SUPERIOR COURT OF THE STATE OF CALIFORNIA
19 FOR THE COUNTY OF LOS ANGELES
20 CENTRAL DISTRICT

21 In Re the Conservatorship of the Person and
Estate of

22 BRITNEY JEAN SPEARS,
23
24 Conservatee.

CASE NO. BP108870

**SUPPLEMENTAL DECLARATION OF
ROBIN GREENHILL IN SUPPORT OF
NON-PARTIES' MOTION TO QUASH
DEPOSITION SUBPOENAS OR IN THE
ALTERNATIVE FOR PROTECTIVE
ORDER**

ASSIGNED FOR ALL PURPOSES TO:
HON. BRENDA J. PENNY
DEPARTMENT 4

1 I, Robin Greenhill, declare as follows:

2 1. I currently serve as a Services Director for Tri Star Sports and Entertainment Group,
3 where I have been employed since 2001. Pursuant to the Court's August 29, 2022 Minute Order,
4 which ordered Tri Star and Ms. Spears to submit declarations concerning Request for Production
5 ("RFP") Nos. 10, 12, 13, 16, 17, 18, 21, 22, and 23, I offer this declaration in support of Non-Parties
6 Tri Star Sports and Entertainment Group's and Robin Greenhill's (collectively, "Tri Star") Motion to
7 Quash Britney Spears' Deposition Subpoenas or in the Alternative for a Protective Order. I have
8 personal knowledge of the facts set forth in this declaration (unless otherwise noted), and if called to
9 testify, I could and would competently testify thereto.

10 **Relevant Background**

11 2. After dutifully providing business management services to Ms. Spears' Estate since
12 January 2010,¹ in August 2020, Tri Star provided notice of its resignation as the business management
13 firm for the Estate, citing as a basis for its resignation the repeated death threats being made to Tri Star
14 employees and their family members. Notwithstanding Tri Star's notice of resignation in August
15 2020, Tri Star agreed to continue as the business management firm until the Estate could retain an
16 appropriate replacement. Prior to the retention of a replacement, Tri Star continued to provide weekly
17 financial reports to the conservators and Ms. Spears' counsel, as it had done since the beginning of its
18 tenure as the Estate's business management firm.

19 3. In October 2020, the conservators retained Miller Kaplan and Tri Star turned over its
20 duties to Miller Kaplan, Ms. Spears' current business management firm.

21 4. Shortly after Tri Star stepped down as the business management firm for the Estate, in
22 order to ensure a smooth transition, it shared with Miller Kaplan a complete set of its books and
23 records related to its work for the Estate, amounting to over 16,000 files, in addition to live
24 QuickBooks data.

25 _____
26 ¹ In late 2008, after the conservatorship was established, Tri Star was hired by co-conservators Mr.
27 Andrew Wallet and Mr. James Spears in a limited capacity to provide business management
28 services for the 2009 "Circus Tour." Gerber & Company ("Gerber") served as the business
management firm for Ms. Spears' Estate from the start of the conservatorship in February 2008
through December 2009.

1 5. These over 16,000 files and QuickBooks data contained the underlying financial records
2 and supporting documentation relating to every penny that came into and went out of Ms. Spears'
3 Estate during Tri Star's tenure. To the extent Tri Star had financial records relating to the period of
4 time prior to Tri Star's work for the Estate, Tri Star also included those records in the files provided to
5 Miller Kaplan. For example, Tri Star provided Britney Spears' and related entities' tax returns dating
6 back years before Tri Star's work for the Estate.

7 6. As detailed below, on three occasions after resigning as business management firm for
8 the Estate, Tri Star provided its successor Miller Kaplan, Justin Gold (counsel for former temporary
9 conservator of the Estate, John Zabel), and Ms. Spears' testifying expert Kroll Associates Inc.
10 ("Kroll"), access to the same corpus of more than 16,000 files. The time span embraced by these files
11 extended to the period when Tri Star's business management services began, and included digitized
12 documents provided to Tri Star by its predecessor, Gerber, dating back years before the inception of
13 the Conservatorship. As set forth in Tri Star's Motion to Quash, Tri Star does not object and has never
14 objected to producing additional responsive documents and correspondence relating to issues that are
15 the subject of Ms. Spears' objections to the 12th Accounting to the extent such documents: (a) have not
16 already been produced; (b) are in the possession, custody, and control of Tri Star or me; and (c) can be
17 located through a reasonable and diligent search. Accordingly, my supplemental declaration focuses
18 on issues concerning the 1st through 11th Accountings, not the 12th Accounting.

19 7. Specifically, the files previously produced included financial data and documentation
20 reflecting the Estate's expenses related to legal representation (RFP No. 12); contractors'
21 compensation, including compensation paid to Tri Star for its work for the Estate (RFP Nos. 10, 21);
22 and payments attendant to Ms. Spears' medications and medical services (RFP No. 16),
23 hospitalizations (RFP No. 17), and stays at residential medical facilities (RFP No. 18).² Further, the
24 files contained organizational and corporate formation documents relating to all entities created for the
25 benefit of the Estate (RFP No. 22) or created to hold the Estate's assets (irrespective of whether Tri
26 Star employees held any managerial position in such entities) (RFP No. 23), bank reconciliation

27 _____
28 ² Pursuant to instructions from then conservator Mr. Spears, Tri Star did not include in the books and
records transfer to Miller Kaplan documents containing HIPPA protected information.

1 reports for each entity, and tax returns for every entity in existence during the time Tri Star served as
2 the Estate's business management firm. And, as stated previously, to the extent the Estate's prior
3 business management firm Gerber provided financial data and documentation to Tri Star covering the
4 period of time prior to 2010, Tri Star included such financial data and documentation in the files it
5 provided to Miller Kaplan.

6 8. In connection with onboarding Miller Kaplan, Tri Star did not simply forward 16,000
7 files and make available for review live QuickBooks data. Tri Star spent many uncompensated hours
8 assisting Miller Kaplan with its initial onboarding and subsequent inquiries about these files
9 throughout late 2020 and 2021. Further, Tri Star provided Miller Kaplan administrative (i.e.,
10 unfettered) access to the live QuickBooks for all Accountings and notified Miller Kaplan that the files
11 would be available for 60 days. After 60 days and in accordance with the parties' arrangement, Tri
12 Star made access to the live QuickBooks inactive.

13 9. As detailed in Tri Star's July 20, 2022 Reply in Support of Tri Star's Motion to Quash
14 (Reply at pp. 6, 13), and the Declaration of Eric Adler in Support of Tri Star's Reply ("Adler
15 Declaration"), in November 2021, Tri Star provided the exact same 16,000 files it provided to Miller
16 Kaplan in 2020 to Justin Gold, counsel for former temporary conservator of the Estate John Zabel, and
17 Ms. Spears' testifying expert Kroll. Attached hereto as **Exhibit 1** is a true and correct copy of the
18 Adler Declaration and accompanying exhibits.

19 10. On November 19, 2021, Mr. Gold emailed Tri Star's counsel Eric Adler alleging that
20 based on Kroll's review, the accounting data and documents relating to entities that were active during
21 the period of the Conservatorship, contracts related to five of Ms. Spears' entities, and documents
22 related to three of Ms. Spears' trusts were missing from Tri Star's production to Mr. Gold and Kroll.
23 Mr. Gold's November 19 email to Mr. Adler is reflected in Exhibit A to the Adler Declaration, which
24 is attached hereto in Exhibit 1.

25 11. I personally reviewed Mr. Gold's November 19 email and spent hours correcting
26 Kroll's false allegations that any accounting data or documents were missing from the over 16,000
27 files and QuickBooks data Tri Star had previously provided Miller Kaplan in Fall 2020 and provided
28

1 again to Mr. Gold and Kroll in November 2021. Specifically, I identified all of the purportedly
2 missing documents or data or confirmed that no such documents or data ever existed.

3 12. On November 22, 2021, Tri Star's counsel Mr. Adler responded to Mr. Gold, directing
4 him to the precise file folders where financial records pertaining to the entities and trusts identified
5 above could be found, or if applicable, informing him that Tri Star did not have in its possession the
6 files Mr. Gold was requesting because they either never existed or pre-dated Tri Star's tenure as the
7 business management firm for the Estate and were not provided to Tri Star by the predecessor business
8 management firm Gerber. Mr. Adler also informed Mr. Gold that financial records relating to five of
9 the entities and one of the trusts he was inquiring about were located in a different QuickBooks
10 application because the entities were closed during Tri Star's tenure as the Estate's business
11 management firm and prior to the transfer of the business management role to Miller Kaplan. Mr.
12 Adler informed Mr. Gold that Tri Star would restore those financial records in QuickBooks and send
13 them to Mr. Gold and Kroll, and asked Mr. Gold to reach out if he had any additional questions. Mr.
14 Adler's November 22 email to Mr. Gold is reflected in Exhibit B to the Adler Declaration, which is
15 attached hereto in Exhibit 1.

16 13. On November 23, 2021, I arranged to have the additional QuickBooks data restored.
17 That same day, Mr. Adler emailed Mr. Gold a link to the additional QuickBooks data mentioned in his
18 November 22 email. My understanding is that the link was sent to Ms. Spears' testifying expert Kroll
19 thereafter. Mr. Adler's November 23 email to Mr. Gold is reflected in Exhibit C to the Adler
20 Declaration, which is attached hereto in Exhibit 1.

21 14. Referring to the files that Tri Star provided to the various entities, I understand that at a
22 hearing on August 24, 2022, Ms. Spears' counsel alluded to the manipulation or locking of data by Tri
23 Star. Without access to a transcript of that hearing, I cannot respond precisely. However, I can
24 categorically state that Tri Star never manipulated data. With respect to the locking of financial data,
25 as a matter of practice, Tri Star locks the financial data in live QuickBooks that has been reviewed and
26 finalized. Further, I informed Miller Kaplan in 2020 and 2021, it could have downloaded the
27 supporting financial documentation through each of the live QuickBooks files. And further, on
28

1 September 9, 2022, I reconfirmed that the live QuickBooks contained the underlying financial
2 documents.

3 **Response to Specific Requests for Production**

4 **Request for Production No. 10**

5 15. RFP No. 10 seeks “All correspondence (whether on paper, electronically, or by text or
6 instant message) RELATING TO YOUR compensation out of the Conservatorship Estate of Britney
7 Jean Spears.” To the extent they exist, and are in Tri Star’s possession, custody, and control, all
8 documents (excluding emails and text messages) related to Tri Star’s “compensation out of the
9 conservatorship” are included in the complete set of books and records and live QuickBooks data Tri
10 Star already provided to Miller Kaplan in Fall 2020, and again to Mr. Zabel’s counsel and Kroll in
11 November 2021. Tri Star’s compensation is reflected most plainly in the various entity schedules of
12 the prior accountings approved by this Court and Ms. Spears’s representatives.

13 16. Tri Star has not yet provided Ms. Spears with “correspondence” responsive to RFP No.
14 10 for the time period covered by the 12th Accounting, but has never objected to producing non-
15 privileged “correspondence” responsive to this RFP that concerns the time period covered by the 12th
16 Accounting. (See Declaration of Scott Edelman in Support of Motion to Quash (“Edelman Decl.”),
17 Exhs. M–N (Tri Star’s and Robin Greenhill’s Objections and Responses to Conservatee’s Deposition
18 Subpoenas).) Based on the Court’s tentative ruling, Tri Star will produce such non-privileged
19 “correspondence” on a rolling basis once the Court issues its ruling on Tri Star’s Motion to Quash.

20 **Request for Production No. 12**

21 17. RFP No. 12 seeks “All DOCUMENTS RELATING TO payments or approvals for
22 payments made out of the Conservatorship Estate of Britney Jean Spears for legal representation of
23 Lou Taylor or Robin Greenhill.” With respect to the 1st through 11th Accountings, no such documents
24 exist. With respect to the 12th Accounting, Tri Star produced records reflecting all payments made for
25 legal services to counsel for the Conservatorship. These records are also included in the complete set
26 of books and records and live QuickBooks data Tri Star already provided to Miller Kaplan in Fall
27 2020, and again to Mr. Zabel’s counsel and Kroll in November 2021. Though Tri Star does not
28 interpret this RFP to include “correspondence,” Tri Star has never objected to producing

1 “correspondence” related to payments and approvals for payments made out of the conservatorship for
2 legal representation during the period covered by the 12th Accounting because it directly relates to Ms.
3 Spears’ objections to the 12th Accounting. (See Edelman Decl., Exhs. M–N.) Based on the Court’s
4 tentative ruling, Tri Star will produce such non-privileged “correspondence” responsive to this RFP on
5 a rolling basis once the Court issues its ruling on Tri Star’s Motion to Quash.

6 **Request for Production No. 13**

7 18. RFP No. 13 seeks “All DOCUMENTS RELATING TO ‘accounting services’ rendered
8 by YOU or on YOUR behalf related to Conservatee Britney Jean Spears.” To the extent they exist,
9 and are in Tri Star’s possession, custody, and control, all documents (excluding emails and text
10 messages) responsive to this RFP are included in the complete set of books and records and live
11 QuickBooks data Tri Star already provided to Miller Kaplan in Fall 2020, and again to Mr. Zabel’s
12 counsel and Kroll in November 2021. Examples include, without limitation, tax returns prepared and
13 filed for the Estate and related entities, bank reconciliations, investment statement reconciliations,
14 credit card statements, annual reports, show settlements, and royalty reporting. Though Tri Star does
15 not interpret this request to include “correspondence,” Tri Star has never objected to producing
16 “correspondence” related to the accounting services rendered by Tri Star related to Ms. Spears’ Estate
17 during the period covered by the 12th Accounting. (See Edelman Decl., Exhs. M–N.) Based on the
18 Court’s tentative ruling, Tri Star will produce such non-privileged “correspondence” responsive to this
19 RFP on a rolling basis once the Court issues its ruling on Tri Star’s Motion to Quash.

20 **Request for Production Nos. 16–18 (the “Medical RFPs”)**

21 19. RFP No. 16 seeks “All correspondence (whether on paper, electronically, or by text or
22 instant message) RELATING TO Britney Jean Spears’s current or past medications.” RFP No. 17
23 seeks “All correspondence (whether on paper, electronically, or by text or instant message)
24 RELATING TO Britney Jean Spears’s hospitalizations.” RFP No. 18 seeks “All correspondence
25 (whether on paper, electronically, or by text or instant message) RELATING TO Britney Jean Spears’s
26 stays at non-hospital, residential medical facilities, including rehabilitation facilities.” To the extent
27 they exist, and are in Tri Star’s possession, custody, and control, all documents reflecting payments for
28 Ms. Spears’ medications and medical services, hospitalizations, or residential medical facilities, as

1 requested by the conservator of the person (initially Jamie Spears, and later, Jodi Montgomery) are
2 included in the complete set of books and records and live QuickBooks data Tri Star already provided
3 to Miller Kaplan in Fall 2020, and again to Mr. Zabel's counsel and Kroll in November 2021.

4 20. Tri Star has not yet provided Ms. Spears with "correspondence" responsive to the
5 Medical RFPs, but has never objected to producing non-privileged "correspondence" responsive to
6 these RFPs as it concerns Tri Star's accounting services rendered during the period covered by the 12th
7 Accounting, which necessarily included processing and payment of medical expenses. (See Edelman
8 Decl., Exhs. M–N.) Based on the Court's tentative ruling, Tri Star will produce such non-privileged
9 "correspondence" on a rolling basis once the Court issues its ruling on Tri Star's Motion to Quash.³

10 **Request for Production No. 21**

11 21. RFP No. 21 seeks "All DOCUMENTS that refer, reflect, or RELATE to the monetary
12 compensation YOU have received as a result of YOUR representation of the Conservatorship Estate of
13 Britney Jean Spears." To the extent they exist, and are in Tri Star's possession, custody, and control,
14 all documents (excluding emails and text messages) responsive to this Request are included in the
15 complete set of books and records and live QuickBooks data Tri Star already provided to Miller
16 Kaplan in Fall 2020, and again to Mr. Zabel's counsel and Kroll in November 2021. As with
17 paragraph 15, Tri Star's compensation is in the various entity schedules of the prior accountings
18 approved by this Court and Ms. Spears's representatives. Tri Star has never objected to producing
19 "correspondence" related to compensation Tri Star received from the Estate during the period of the
20 12th Accounting because it directly relates to Ms. Spears' objections to the 12th Accounting. (See
21 Edelman Decl., Exhs. M–N.) Based on the Court's tentative ruling, Tri Star will produce such non-
22 privileged "correspondence" on a rolling basis once the Court issues its ruling on Tri Star's Motion to
23 Quash.

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25
26 ³ All of Ms. Spears' medications, medical services, hospitalizations, or stays at residential medical
27 facilities were directed and controlled exclusively by her medical team, the conservator of the
28 person, and Ms. Spears' court-appointed counsel and guardian ad litem Sam Ingham. To the extent
the Court concludes "correspondence" related to Ms. Spears' medications or medical services,
hospitalizations, or stays at residential medical facilities is relevant to any pending petition, it is Tri
Star's position that such information should be sought from the individuals who controlled those
issues: Ms. Spears' medical team, Mr. Spears, Sam Ingham, and/or Jodi Montgomery.

22. I understand Ms. Spears has asserted (through her counsel) that the previously filed Accountings and Tri Star books and records provided to Miller Kaplan in Fall 2020, and again to Mr. Zabel's counsel and Kroll in November 2021, are insufficient to moot RFP No. 21 (the compensation Tri Star received for its work for the Estate). I disagree and believe no additional supporting documentation is needed for Ms. Spears to determine the compensation Tri Star received for its work for the Estate, or the compensation received by the dozens of other professionals who provided services to the Estate (e.g., lawyers, managers, accountants, or agents). For example, I understand Ms. Spears argues that she cannot "independently verif[y]" the compensation Tri Star received for its work for the Estate because the Accountings filed with the Court are "limit[ed]" and "incomplete," since "the accountings do not cover Ms. Spears's assets held outside the Estate," and "entities formed after the Conservatorship was established [are] not reflected in the Inventories." (B. Spears Opp. at p. 9 fn. 7.) However, Tri Star has turned over to Ms. Spears all of its books and records reflecting every one of the Estate's transactions during Tri Star's tenure as the business management firm to the Estate, and neither Tri Star nor I have received any compensation from Ms. Spears' Estate outside of what is reflected in those books and records and in the submitted and Court-approved Accountings.

23. Further, while the Summary of Account does not include the Estate's business activities on a transaction by transaction level, Schedule F attached to the Accountings includes the Estate's business activities on a detailed entity level. (See Twelfth Account Current at pp. 9, 102–103.) Moreover, all of the 16,000 files and QuickBooks data that Tri Star provided to Miller Kaplan in Fall 2020, and again to Mr. Zabel's counsel and Kroll in November 2021, contain transaction level detail for all of the Estate's business activities.

24. Moreover, though the Inventories in the Accountings solely reflect what existed at the inception of the Conservatorship, detailed financial information related to active entities formed after the Conservatorship was established are reflected in Schedule F, while cash assets, investments, and physical property held in entities created after the Conservatorship was established are reflected in Schedules 13a and 13b. (Compare First Supplement to First Account at p. 48, with Twelfth Account Current at pp. 205–206.) I and/or Tri Star's finance and accounting personnel have reviewed all of the Accountings the conservators of the Estate submitted to the Court for approval during the years Tri

1 Star served as the business management firm for the Estate, and neither I nor anyone else at Tri Star is
2 aware of any business activities that were not accounted for and accurately reflected in the
3 Accountings that the conservators of the Estate, not Tri Star, prepared and submitted to the Court, in
4 the format required by the Court. Probate Code §10629(c) does not require an accounting for the
5 entities.

6 **Request for Production Nos. 22 and 23 (“Corporate Formation RFPs”)**

7 25. RFP No. 22 seeks “All organizational and corporate formation documents for all
8 entities created for the benefit or purported benefit of Britney Jean Spears.” RFP No. 23 seeks “All
9 organizational and corporate formation documents for all entities that have received or held
10 Conservatorship Estate assets and in which YOU or any of YOUR officers or employees have held or
11 hold an officer, director, managing member, general partner, or managing agent position.” Neither Tri
12 Star nor any of its officers or employees have held or hold an officer, director, managing member,
13 general partner, or managing agent position. As such, documents responsive to this request do not
14 exist. Tri Star already provided to Miller Kaplan in Fall 2020, and again to Mr. Zabel’s counsel and
15 Kroll in November 2021 a complete set of the books and records for the entities created for the benefit
16 of Britney Jean Spears. For example, the books and records, contained all certificates of incorporation
17 for the entities created for the benefit of Britney Jean Spears for each of the years Tri Star served as
18 business management firm to the Estate.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is true
2 and correct, and that I executed this Declaration on September 13, 2022 at Nashville, Tennessee.
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5 By: Robin Greenhill
6 Robin Greenhill
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EXHIBIT 1

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Attorneys for Non-Party Robin Greenhill

Attorneys for Non-Party Tri Star Sports and
Entertainment Group

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
CENTRAL DISTRICT

In Re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,
Conservatee.

CASE NO. BP108870

**DECLARATION OF ERIC ADLER IN
SUPPORT OF NON-PARTIES' REPLY IN
SUPPORT OF MOTION TO QUASH
DEPOSITION SUBPOENAS OR IN THE
ALTERNATIVE FOR PROTECTIVE
ORDER**

*Filed concurrently with Reply; Evidentiary
Objections to Declarations of Kyle Freeny and
Sherine Ebadi and Exhibits to Opposition; and
Request for Judicial Notice*

ASSIGNED FOR ALL PURPOSES TO:
HON. BRENDA J. PENNY
DEPARTMENT 4

Hearing Date: July 27, 2022
Hearing Time: 1:30 p.m.
Hearing Place: Dept. 4

1 I, Eric Adler, declare as follows:

2 1. I am an attorney admitted to practice law before this Court and all of the courts of the
3 State of California. I am a partner at the law firm of Magee & Adler, APC and counsel for Non-Party
4 Tri Star Sports and Entertainment Group in the above-captioned matter. I offer this declaration in
5 support of Non-Parties Tri Star Sports and Entertainment Group's and Robin Greenhill's (collectively,
6 "Tri Star") Reply in Support of Motion to Quash Deposition Subpoenas or in the Alternative for
7 Protective Order. I have personal knowledge of the facts set forth in this declaration (unless otherwise
8 noted), and if called to testify, I could and would competently testify thereto.

9 2. Contrary to the contention in Ms. Spears' Opposition that Tri Star refuses to produce
10 any documents to Ms. Spears, Tri Star has repeatedly made itself available to answer any questions
11 regarding the Spears Estate accountings and the over 16,000 files Tri Star provided first to Ms. Spears'
12 current business management firm Miller Kaplan in 2020, and again to Justin Gold, counsel for former
13 temporary conservator of the Estate John Zabel, and Ms. Spears' testifying expert Kroll Associates Inc.
14 ("Kroll") in November 2021. Attached hereto as **Exhibit A** is a true and correct copy of my
15 correspondence with Mr. Gold from November 18 to November 19, 2021.

16 3. On November 19, Mr. Gold emailed me with questions regarding 23 of Ms. Spears'
17 entities that were active during the period of the conservatorship, contracts related to five of Ms.
18 Spears' entities, and documents related to three of Ms. Spears' trusts. Mr. Gold's November 19 email
19 is reflected in Exhibit A attached hereto.

20 4. On November 22, I answered Mr. Gold's questions, and directed him to the
21 QuickBooks file folders where financial records pertaining to those entities and trusts could be found.
22 I also informed him that financial records relating to five of the entities and one of the trusts he was
23 inquiring about were located in a different QuickBooks application because the entities were closed
24 during Tri Star's tenure as the Estate's business management firm and prior to the transfer of the
25 business management role to Miller Kaplan. I informed Mr. Gold that Tri Star would restore those
26 financial files and send them to Mr. Gold and Kroll, and asked Mr. Gold to reach out if he had any
27 additional questions. Attached hereto as **Exhibit B** is a true and correct copy of my November 22
28 email to Mr. Gold.

1 5. On November 23, I emailed Mr. Gold a link to the additional QuickBooks data
2 mentioned in my November 22 email. My understanding is that the link was sent to Kroll thereafter.
3 Attached hereto as **Exhibit C** is a true and correct copy of my November 23 email to Mr. Gold.
4

5 I declare under penalty of perjury under the laws of the United States that the foregoing is true
6 and correct, and that I executed this Declaration on July 20, 2022, in Long Beach, California.
7
8

9 By: _____

eric adler

Eric Adler
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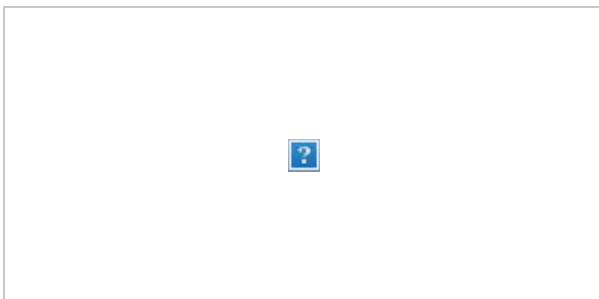
EXHIBIT A

From: [Eric R. Adler, Esq.](#)
To: [Justin Gold](#)
Subject: RE: Tri-Star Quick Books
Date: Friday, November 19, 2021 7:18:00 PM
Attachments: [image001.png](#)

To be clear, link for documents AND quick book. This is quite a bit to digest and we will work on this and answer it early next week.

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Privileged And Confidential Communication: This electronic transmission, and any documents attached hereto, (a) are protected by the Electronic Communications Privacy Act (18 USC §§ [2510-2521](#)), (b) may contain confidential and/or legally privileged information, and (c) are for the sole use of the intended recipient named above. If you have received this electronic message in error, please notify the sender and delete the electronic message. Any disclosure, copying, distribution, or use of the contents of the information received in error is strictly prohibited.



From: Justin Gold <jgold@ocslaw.com>
Sent: Friday, November 19, 2021 11:07 AM
To: Eric R. Adler, Esq. <eric@mageeadler.com>
Subject: RE: Tri-Star Quick Books

Eric, I can confirm that it is fine for your client to shut down the link for the documents recently provided right now, as all of the provided documents have now been downloaded. As I mentioned in previous correspondence, there is other information which we need, but do not have access to (and were not in the production just made), and we believe it is within your client's exclusive possession. Specifically, we have not yet received quickbooks files or other accounting data or business records for the other 23 entities that were active during the period of the conservatorship. Those entities are:

- [REDACTED]
- [REDACTED]
- [REDACTED]

-
- | Age Group | Percentage of Respondents |
|--------------|---------------------------|
| 18-29 | 90% |
| 30-49 | 88% |
| 50-64 | 85% |
| 65 and older | 75% |

We also request production of all contracts and agreements with the following additional entities:

- **1990s** - **1999** - **2000** - **2001** - **2002** - **2003** - **2004** - **2005** - **2006** - **2007** - **2008** - **2009** - **2010** - **2011** - **2012** - **2013** - **2014** - **2015** - **2016** - **2017** - **2018** - **2019** - **2020** - **2021** - **2022** - **2023** - **2024** - **2025** - **2026** - **2027** - **2028** - **2029** - **2030** - **2031** - **2032** - **2033** - **2034** - **2035** - **2036** - **2037** - **2038** - **2039** - **2040** - **2041** - **2042** - **2043** - **2044** - **2045** - **2046** - **2047** - **2048** - **2049** - **2050** - **2051** - **2052** - **2053** - **2054** - **2055** - **2056** - **2057** - **2058** - **2059** - **2060** - **2061** - **2062** - **2063** - **2064** - **2065** - **2066** - **2067** - **2068** - **2069** - **2070** - **2071** - **2072** - **2073** - **2074** - **2075** - **2076** - **2077** - **2078** - **2079** - **2080** - **2081** - **2082** - **2083** - **2084** - **2085** - **2086** - **2087** - **2088** - **2089** - **2090** - **2091** - **2092** - **2093** - **2094** - **2095** - **2096** - **2097** - **2098** - **2099** - **2100** - **2101** - **2102** - **2103** - **2104** - **2105** - **2106** - **2107** - **2108** - **2109** - **2110** - **2111** - **2112** - **2113** - **2114** - **2115** - **2116** - **2117** - **2118** - **2119** - **2120** - **2121** - **2122** - **2123** - **2124** - **2125** - **2126** - **2127** - **2128** - **2129** - **2130** - **2131** - **2132** - **2133** - **2134** - **2135** - **2136** - **2137** - **2138** - **2139** - **2140** - **2141** - **2142** - **2143** - **2144** - **2145** - **2146** - **2147** - **2148** - **2149** - **2150** - **2151** - **2152** - **2153** - **2154** - **2155** - **2156** - **2157** - **2158** - **2159** - **2160** - **2161** - **2162** - **2163** - **2164** - **2165** - **2166** - **2167** - **2168** - **2169** - **2170** - **2171** - **2172** - **2173** - **2174** - **2175** - **2176** - **2177** - **2178** - **2179** - **2180** - **2181** - **2182** - **2183** - **2184** - **2185** - **2186** - **2187** - **2188** - **2189** - **2190** - **2191** - **2192** - **2193** - **2194** - **2195** - **2196** - **2197** - **2198** - **2199** - **2200** - **2201** - **2202** - **2203** - **2204** - **2205** - **2206** - **2207** - **2208** - **2209** - **2210** - **2211** - **2212** - **2213** - **2214** - **2215** - **2216** - **2217** - **2218** - **2219** - **2220** - **2221** - **2222** - **2223** - **2224** - **2225** - **2226** - **2227** - **2228** - **2229** - **2230** - **2231** - **2232** - **2233** - **2234** - **2235** - **2236** - **2237** - **2238** - **2239** - **2240** - **2241** - **2242** - **2243** - **2244** - **2245** - **2246** - **2247** - **2248** - **2249** - **2250** - **2251** - **2252** - **2253** - **2254** - **2255** - **2256** - **2257** - **2258** - **2259** - **2260** - **2261** - **2262** - **2263** - **2264** - **2265** - **2266** - **2267** - **2268** - **2269** - **2270** - **2271** - **2272** - **2273** - **2274** - **2275** - **2276** - **2277** - **2278** - **2279** - **2280** - **2281** - **2282** - **2283** - **2284** - **2285** - **2286** - **2287** - **2288** - **2289** - **2290** - **2291** - **2292** - **2293** - **2294** - **2295** - **2296** - **2297** - **2298** - **2299** - **2300** - **2301** - **2302** - **2303** - **2304** - **2305** - **2306** - **2307** - **2308** - **2309** - **2310** - **2311** - **2312** - **2313** - **2314** - **2315** - **2316** - **2317** - **2318** - **2319** - **2320** - **2321** - **2322** - **2323** - **2324** - **2325** - **2326** - **2327** - **2328** - **2329** - **2330** - **2331** - **2332** - **2333** - **2334** - **2335** - **2336** - **2337** - **2338** - **2339** - **2340** - **2341** - **2342** - **2343** - **2344** - **2345** - **2346** - **2347** - **2348** - **2349** - **2350** - **2351** - **2352** - **2353** - **2354** - **2355** - **2356** - **2357** - **2358** - **2359** - **2360** - **2361** - **2362** - **2363** - **2364** - **2365** - **2366** - **2367** - **2368** - **2369</**

With respect to the trusts, to the extent your client has anything related to the following trusts, please provide all trust documents and documents for all financial transactions for:

- 
- 
- 

Thanks,

Justin B. Gold, Esq.
OLDMAN, COOLEY, SALLUS,
BIRNBERG, COLEMAN & GOLD LLP
16133 Ventura Boulevard
Penthouse Suite
Encino, California 91436-2447
Telephone: (818) 986-8080
Facsimile: (818) 789-0947
jgold@ocslaw.com
oldmancooley.com

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From: Eric R. Adler, Esq. <eric@mageeadler.com>

Sent: Thursday, November 18, 2021 6:54 PM

To: Justin Gold <jgold@ocslaw.com>

Subject: RE: Tri-Star Quick Books

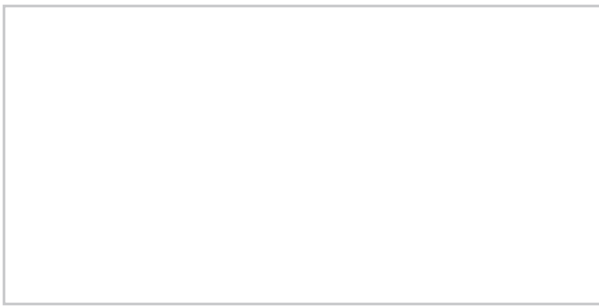
Justin:

My client is going to shut down the link(s) tomorrow at 5 p.m. before the weekend and holiday week. As we discussed, we think this is a security issue and Kroll has apparently downloaded everything. To the extent that your (Matt's) vendor was not able to download any information, anything is missing, or there are any other issues, then please let me know and we will be happy to work with you or your vendor to transfer that data even though the conservatorship has ended minus the "conditions subsequent".

Eric

Magee & Adler, APC
400 Oceangate, Suite 1030
Long Beach, CA 90802
Direct Dial: 562.432.1154
Cell Phone: 310.433.6844

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From: Justin Gold <jgold@ocslaw.com>
Sent: Thursday, November 18, 2021 5:18 PM
To: Eric R. Adler, Esq. <eric@mageeadler.com>
Subject: Tri-Star Quick Books

Eric, we are actively downloading the quick books ("QB") files, but as I understand it, QB files are not like pdfs where we can just download them and deal with it later. The QB files need to be downloaded and then checked to make sure that everything was exported correctly in the transfer. We are in the process of doing that, and trying to make sure that everything is exported completely and accurately so there is no confusion in the future. I understand that this is actively being done and I will inform you as to when it is complete.

Thanks,

Justin B. Gold, Esq.
OLDMAN, COOLEY, SALLUS,
BIRNBERG, COLEMAN & GOLD LLP
16133 Ventura Boulevard
Penthouse Suite
Encino, California 91436-2447
Telephone: (818) 986-8080
Facsimile: (818) 789-0947
jgold@ocslaw.com
oldmancooley.com

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To: eric@mageeadler.com [Remove](#) this sender from my allow list
From: jgold@ocslaw.com

You received this message because the sender is on your allow list.

EXHIBIT B

From: [Eric R. Adler, Esq.](#)
To: [Justin B. Gold \(Work\)](#)
Cc: [Feinstein, Diana M.](#); [Edelman, Scott A.](#)
Bcc: [Lou Taylor](#); [Robin Greenhill](#)
Subject: Spears
Date: Monday, November 22, 2021 10:03:00 PM
Attachments: [image001.png](#)

Dear Justin,

Thank you for your email. Below please find responses to your inquiries from Tri Star. Tri Star provides the below information without waiver of its legal position that the first through eleventh accountings are closed and therefore not the proper subject of discovery. Any responses/documents related to entities closed before Tri Star served as business management firm for the Estate are based on records/information provided to Tri Star from the Estate's prior business manager Gerber & Co and/or entertainment counsel to the Estate.

In your email, you indicate that you have not yet received quickbooks files or other accounting data or business records for the following 23 entities you contend were active during the period of the conservatorship. As reflected below, Tri Star previously provided Miller Kaplan more than a year ago, and again provided you and Mr. Rosengart's consultant at Kroll access to these records, to the extent they exist, several weeks ago. For all entities bolded in green, financial files are in QuickBooks Desktop (QBD) not QuickBooks Online (QBO) because the entities were closed during Tri Star's tenure as business management firm for the Estate and prior to transfer of the business management role to Miller Kaplan. Tri Star is willing to take the steps necessary to restore the QBD files it has for those entities to backup records and provide those backups to you and Mr. Rosengart's consultant at Kroll. We will promptly notify you when we have loaded the backups to the sharelink previously provided, likely tomorrow.

- [REDACTED] – All information Tri Star has on this entity is enclosed in the folder titled [REDACTED]". [REDACTED]
[REDACTED].
- [REDACTED] – This entity's financial files are in QBD not QBO because the entity was closed and shut down in [REDACTED]. There are full historical financials (balance sheet, general ledger, and profit and loss statement) for this entity that were generated by Tri Star from the QDB file and enclosed in the folder path "[REDACTED]
[REDACTED] [REDACTED]".
- [REDACTED] – Organized [REDACTED] This entity was closed prior to Tri Star serving as business management firm for the Estate. [REDACTED] [REDACTED]
[REDACTED]
- [REDACTED] – This entity's files are in QDB not QBO because this entity was closed and shut down in [REDACTED]. There are full historical financials (balance sheet, general ledger, and profit and loss statement) for this entity that were generated by Tri Star from the QDB file and enclosed in the folder path "[REDACTED]
[REDACTED] [REDACTED]
- [REDACTED] – The QBO for this entity has already been provided to Miller Kaplan in

November 2020 and Kroll in November 2021 (the audit records reflect it was downloaded by Kroll on Nov. 17, 2021). Further documents related to this entity are enclosed in in the folder "[REDACTED]."

- [REDACTED] -- Organized [REDACTED]. This entity was dissolved [REDACTED] pre Tri Star serving as business management firm for the Estate. Tri Star previously provided the QBO file for [REDACTED] to Kroll and Miller Kaplan (audit records reflect it was downloaded by Kroll on November 15, 2021). Other business records related to [REDACTED] are enclosed in the folder "[REDACTED]"
- [REDACTED] -- Organized [REDACTED]. This entity was dissolved [REDACTED] pre Tri Star serving as business management firm for the Estate. Tri Star previously provided the QBO file for [REDACTED] to Kroll and Miller Kaplan (audit records reflect it was downloaded by Kroll on November 15, 2021). Other business records related to [REDACTED] are enclosed in the folder "[REDACTED]"
- [REDACTED] -- Organized [REDACTED]. This entity was closed [REDACTED], prior to Tri Star serving as business management firm for the Estate. Documents Tri Star obtained from the Estate's prior business management firm Gerber & Co. related to this entity are enclosed in the folder "[REDACTED]."
- [REDACTED] -- Organized [REDACTED]. This entity was closed pre Tri Star serving as business management firm for the Estate.
- [REDACTED] This entity's files are in QDB not QBO because this entity was closed and shut down in [REDACTED]. Documents related to this entity are enclosed in the folder "[REDACTED]"
- [REDACTED] -- Tri Star does not know what this is. Tri Star is only aware of [REDACTED]
- [REDACTED] -- Organized [REDACTED]. This entity was closed in [REDACTED] pre Tri Star serving as business management firm for the Estate. Tri Star previously provided the QBO file for [REDACTED] to Kroll and Miller Kaplan (audit records reflect it was downloaded by Kroll on November 15, 2021). Other business records related to [REDACTED] are enclosed in the folder "[REDACTED]."
- [REDACTED] -- Organized [REDACTED]. This entity was closed/revoked prior to Tri Star serving as business management firm for the Estate.
- [REDACTED] -- Organized [REDACTED]. This entity's files are in QDB not QBO because this entity was closed in [REDACTED] and the closing documents and all other documentation is contained in the folder titled "[REDACTED]."

- [REDACTED] – Tri Star does not know what this is.
- [REDACTED] – Organized [REDACTED]. This entity was dissolved on [REDACTED] prior to Tri Star serving as business management firm for the Estate. This [REDACTED]
[REDACTED]
- [REDACTED] – This is [REDACTED] which [REDACTED] [REDACTED] Tri Star previously provided the QBO file for [REDACTED] to Kroll and Miller Kaplan (audit records reflect it was downloaded by Kroll on November 15, 2021). Other documents related to [REDACTED] are enclosed in the folder titled “[REDACTED].”
- [REDACTED] – This [REDACTED] was dissolved in [REDACTED] prior to Tri Star serving as business management firm for the Estate. Documents Tri Star obtained from the Estate’s prior business management firm Gerber & Co. related to this [REDACTED] are enclosed in the folder titled [REDACTED].
- [REDACTED] – Tri Star does not know what this is.
- [REDACTED] — Organized [REDACTED]. This [REDACTED] was closed in [REDACTED]. All information Tri Star has on this entity is enclosed in the folder [REDACTED]
[REDACTED].”
- [REDACTED] – This entity’s files are in QDB not QBO because this entity was closed in [REDACTED]. Documents related to this entity are enclosed in the folder titled [REDACTED].”
- [REDACTED] – Organized [REDACTED]. This entity was closed in [REDACTED] pre Tri Star serving as business management firm for the Estate. Tri Star previously provided the QBO file for [REDACTED] to Kroll and Miller Kaplan (audit records reflect it was downloaded by Kroll on November 15, 2021). Other business records related to [REDACTED] are enclosed in the folder “[REDACTED].”
- [REDACTED] – This entity was closed pre Tri Star serving as business management firm for the Estate. Documents Tri Star obtained from the Estate’s prior business management firm Gerber & Co. related to this entity is enclosed in the folder path “[REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]”

In your email, you request production of all contracts and agreements with the following additional entities. As reflected below, Tri Star previously provided Miller Kaplan more than a year ago, and again provided you and Mr. Rosengart’s consultant at Kroll access to the contracts and agreements, to the extent they exist, several weeks ago.

- [REDACTED] – Tri Star does not know what this is.

- [REDACTED] – The original contract was under [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Both contracts are under the proper entities in the folders titled [REDACTED]
[REDACTED]
- [REDACTED] – Tri Star does not know what this is.
- [REDACTED] – Tri Star does not know what this is.
- [REDACTED] – Tri Star does not know what this is. Tri Star needs more information to assist.

In your email, you request anything Tri Star has related to the following trusts, including trust documents and documents for all financial transactions. As reflected below, Tri Star previously provided Miller Kaplan more than a year ago, and again provided you and Mr. Rosengart's consultant at Kroll access to trust documents, to the extent they exist, several weeks ago.

- [REDACTED] This trust's files are in QDB not QBO because this entity was closed in [REDACTED]. This trust [REDACTED]. Documents related to this trust are enclosed in the folder titled [REDACTED]
- [REDACTED] – Tri Star was not involved with this trust. [REDACTED] has all documents related to this trust.
- [REDACTED] – The executed trust documents are contained in the folder path [REDACTED]."

If you have any questions, then please let me know.

Eric

Magee & Adler, APC
400 Oceangate, Suite 1030
Long Beach, CA 90802
Direct Dial: 562.432.1154
Cell Phone: 310.433.6844

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EXHIBIT C

From: [Eric R. Adler, Esq.](#)
To: [Justin B. Gold \(Work\)](#)
Subject: Spears
Date: Tuesday, November 23, 2021 9:25:00 AM
Attachments: [image001.png](#)

Dear Justin,

As referenced in my email from yesterday evening, Tri Star has restored the backups to the QBD files and uploaded them to the link below. You can find them in the folder path "[REDACTED]" I will send you the user name and password to access these files under separate cover.

[https://www.\[REDACTED\]](https://www.[REDACTED])

Magee & Adler, APC
400 Oceangate, Suite 1030
Long Beach, CA 90802
Direct Dial: 562.432.1154
Cell Phone: 310.433.6844

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PROOF OF SERVICE

I, Jodi Vermilion, declare as follows:

I am employed in the County of Los Angeles, State of California, I am over the age of eighteen years and am not a party to this action; my business address is 400 Oceangate, Suite 1030 Long Beach, California 90802. On September 13, 2022, I served the following document:

**SUPPLEMENTAL DECLARATION OF ROBIN GREENHILL IN SUPPORT OF
NON-PARTIES' MOTION TO QUASH DEPOSITION SUBPOENAS OR IN
THE ALTERNATIVE FOR PROTECTIVE ORDER**

on the parties stated below, by the following means of service:

Britney J. Spears c/o Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067-2121 Tel: (310) 586-7700 E-Mail: RosengartM@gtlaw.com freenyk@grlaw.com mccurdyl@gtlaw.com gershmanm@gtlaw.com	Former Conservatee
Mathew S. Rosengart Greenberg Traurig LLP 1840 Century Park East, Suite 1900 Los Angeles, CA 90067-2121 Tel: (310) 586-7700 E-Mail: RosengartM@gtlaw.com freenyk@grlaw.com mccurdyl@gtlaw.com gershmanm@gtlaw.com	Attorney for Former Conservatee
Justin B. Gold Oldman, Cooley, Sallus, Birnberg, Coleman & Gold, LLP 16133 Ventura Blvd., Penthouse Suite Encino, CA 91436 Tel: (818) 986-8080 E-Mail: jgold@ocslaw.com	Attorneys for John Zabel, Former Temporary Conservator of the Estate
Alex Weingarten Wilkie Farr & Gallagher, LLP 2029 Century Park East, Suite 400 Los Angeles, CA 90067 Email; aweingarten@wilkie.com ebakewell@wilkie.com	Attorneys for James P. Spears, Former Conservator of the Estate

<p>Jodi Montgomery 1443 E. Washington Boulevard, Suite #644 Pasadena, CA 91104 Tel: (626) 398-2090 E-Mail: Jodi@paismontgomery.com</p>	Former Conservator of the Person
<p>Lauriann C. Wright Marie Mondia Wright Kim Douglas, ALC 130 S. Jackson Street Glendale, CA 91205-1123 Tel: (626) 356-3900 E-Mail: lauriann@wkdlegal.com; marie@wkdlegal.com</p>	Attorneys for Jodi Montgomery
<p>Yasha Bronshteyn Ginzburg & Bronshteyn, LLP 11755 Wilshire Blvd., Suite 1250 Los Angeles CA 90025 Tel: (310) 914-3222 E-Mail: yasha@gbllp-law.com</p>	Attorneys for Lynne Spears, Mother of Former Conservatee
<p>Gladstone N. Jones, III Lynn E. Swanson JONES SWANSON HUDDALL & GARRISON, LLC Pan-American Life Center 601 Pyodras Street, Suite 2655 New Orleans, LA 70130 Tel: 504-523-2500 Email: gjones@jonesswanson.com; lswanson@jonesswanson.com</p>	Attorneys for Lynne Spears, Mother of Former Conservatee

<input checked="" type="checkbox"/>	BY ELECTRONIC SERVICE: On the above-mentioned date, I caused the documents to be sent to the persons at the electronic notification addresses as shown above.	
<input checked="" type="checkbox"/>	I am employed in the office of Magee & Adler, APC and certify that the foregoing document was printed on recycled paper.	
<input checked="" type="checkbox"/>	(STATE)	I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed: September 13, 2022


Jodi Vermilion